

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
CHRISTOPHER J. CAVALIER,	:	
MARGARET A. CAVALIER,	:	
Debtors,	:	Case No.: 1:18-bk-03303-HWV
	:	
	:	Chapter 13
	:	
FORD MOTOR CREDIT COMPANY, LLC:	:	
Movant,	:	
	:	
v.	:	
	:	
CHRISTOPHER J. CAVALIER,	:	
MARGARET A. CAVALIER,	:	
Respondents,	:	
	:	
CHARLES J. DEHART, III	:	
Trustee	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

AND NOW COME, Debtors, Christopher J. Cavalier and Margaret A. Cavalier, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. The vehicle is insured.
6. Paragraph 6 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

7. Paragraph 7 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

8. Admitted in part and denied in part. It is admitted Debtors are behind to Movant. It is denied as to the amount of post-petition arrears. Debtors arrears are small and it is anticipated they will be paid current prior to the hearing on this matter.

9. Paragraph 9 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: March 11, 2021

/s/Chad J. Julius

Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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Trustee	:	

CERTIFICATE OF SERVICE

I, Dera Shade, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion for Relief from The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) PO Box 7005 Lancaster, PA 17604	Howard Gershman, Esquire GERSHMAN LAW OFFICES, PC 610 York Road, Suite 200 Jenkintown, PA 19046
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

/s/Dera Shade
 Dera Shade, Paralegal
 Jacobson, Julius & Harshberger
 8150 Derry Street
 Harrisburg, PA 17111
 717.909.5858
 Email: dshade@ljacobsonlaw.com

Dated: March 11, 2021